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May 14, 2024

## **By ECF**

Honorable Freda L. Wolfson, U.S.D.J. Lowenstein Sandler LLP One Lowenstein Drive Roseland, NJ 07068

**Re:** Motion to Compel Documents Responsive to Requests

For Production Nos. 95 and 96

Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC,

Civil Action No. 22-2632 (JKS) (CLW)

Dear Judge Wolfson:

On behalf of Johnson & Johnson Health Care Systems Inc. ("JJHCS"), we write pursuant to the Court's directives from the April 8, 2024 conference and April 10, 2024 email to electronically file discovery applications that were previously submitted via email. In accordance with that directive, we are herein electronically filing a fully briefed version of JJHCS's Motion to Compel Documents Responsive to Requests for Production Nos. 95 and 96 (the "Motion to Compel") consisting of the below papers:

- 1) JJHCS's Letter Motion to Compel, dated March 13, 2024, with Exhibits 1-19;
- 2) Save On SP, LLC's Opposition to Motion to Compel, dated March 21, 2024, with Exhibits 1-16; and,

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3) JJHCS's Reply to Motion to Compel, dated March 25, 2024, with Exhibits 20-33.

In addition to the above and not electronically filed herein, JJHCS submitted by email to Your Honor the native audio file of its Exhibit 6 (SOSP\_521205) in connection with its moving papers.

Per the parties' agreement, we are filing these papers under temporary seal pending the filing of any related motions to seal.

Respectfully submitted,

/s/ Katherine M. Lieb
Katherine M. Lieb

cc: All counsel of record